

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ABC CORPORATION I,)
ABC CORPORATION II,)
)
Plaintiffs,)
) Case No. 20-cv-4806
v.)
) Judge Thomas M. Durkin
THE PARTNERSHIPS AND) Magistrate Judge Jeffrey Cole
UNINCORPORATED ASSOCIATIONS)
IDENTIFIED ON SCHEDULE A,)
)
Defendants.)
)
)

**DEFENDANT AND THIRD-PARTY RESPONDENTS'
MOTION FOR IMPOSITION OF AN APPEAL BOND**

Come Now, Defendant Gyroor-US (“Defendant”) and Third-Party Respondents Gyroor, Urbanmax, GaodeshangUS, Fengchi-US, Gyroshoes, and HGSM (collectively, “Third-Party Respondents”) respectfully move the Court to grant Defendant and Third-Party Respondents’ Motion for Imposition for an Appeal Bond and enter an order requiring Plaintiffs Hangzhou Chic Intelligent Technology Co., Ltd. and Unicorn Global, Inc. to post an appeal bond in the amount of at least \$100,000.

In support of this Motion, Defendant and Third-Party Respondents herewith submit a Memorandum of Law.

Date: 3/7/2024

/s/ Na Zhang

Na Zhang, Esq.
GLACIER LAW LLP

506 Second Ave., Ste 1516
Seattle, WA 98104
queena.zhang@glacier.law
206-397-8633

GLACIER LAW LLP
41 Madison Avenue, Ste 2529
New York, NY 10010
Wei Wang, Esq.
wei.wang@glacier.law
332-777-7315

GLACIER LAW LLP
200 E. Randolph Dr., Ste. 5100
Chicago, IL 60601
Ruoting Men, Esq.
ruoting.men@glacier.law
Tianyu Ju, Esq.
iris.ju@glacier.law
312-270-0413

Attorneys for Defendant and Third-Party Respondents

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this March 7, 2024, I electronically filed the foregoing file with the Clerk of Court using the CM/ECF system, and service was perfected on all counsel of record and interested parties through this system, which will deliver a true and correct copy of the foregoing documents via CM/ECF.

Date: 3/7/2024

/s/ Na Zhang